

Exhibit C

From: [Rodney](#)
To: [Ricardo Rosado](#)
Cc: [Joe Cooley](#); [Dorothy Weber](#)
Subject: Re: Letter to Rodney Oliver & Joe Cooley 6.30.2025
Date: Wednesday, July 2, 2025 3:43:42 PM

Ms Weber

I am writing to address the status of my responses to your client's interrogatories.

As you know, under the Copyright Act and controlling case law (*Newton v. Diamond*, 388 F.3d 1189 (9th Cir. 2004)), your client must identify the **specific protectable elements** of the composition that are alleged to have been copied, and confirm whether those elements appear in the deposit copy filed with the Copyright Office. To date, despite my repeated requests, your client has not confirmed or authenticated the deposit copy that I obtained from the Copyright Office, nor have you specified which parts of that copy your client believes were copied.

Without that information — which is exclusively within your client's control — I cannot provide complete and accurate responses to your interrogatories that ask about alleged similarities, copying, or my knowledge of the claimed infringement.

Accordingly, I will provide good-faith responses to the extent I can, but I am forced to note that **my substantive responses must remain incomplete** until your client complies with its obligations to:

1.

Confirm and authenticate the deposit copy for Registration EU0000387551 (Renewal RE0000841799); and

2.

Identify exactly what protectable material they claim was copied.

I respectfully reserve my right to supplement my interrogatory responses if and when you provide this basic information.

Please confirm by July 7, 2025 whether your client will do so. If not, I reserve my right to raise this issue with the Court and to seek any appropriate relief.

Thank you for your attention to this matter.

Sincerely,

Rodney Oliver

On Mon, Jun 30, 2025, 10:30 AM Ricardo Rosado <ricardo@musiclaw.com> wrote:

Dear Mr. Oliver and Mr. Cooley:

On behalf of Dorothy Weber, Esq., please see the attached letter.

Please do not respond to my email, any response should be directed to dorothy@musiclaw.com.

Sincerely,

Ricardo Rosado

Legal Assistant to Dorothy M. Weber, Esq.

Herbsman, Hafer, Weber & Frisch, LLP

[494 Eighth Avenue, 6th Floor](http://494EighthAve.com)

[New York, New York 10001](http://494EighthAve.com)

Phone: (212) 245-4580 Ext. 6064

Fax: (212) 956-6471

Email: ricardo@musiclaw.com